

LAWRENCE C. HERSH
ATTORNEY AT LAW
17 Sylvan Street, Suite 102b
Rutherford, New Jersey 07070

*ADMITTED NJ, NY, CA, AND IL

*REGISTERED U.S. PATENT AND TRADEMARK OFFICE

Tel: (201) 507-6300

Fax: (201) 507-6311

email: lh@hershlegal.com

March 20, 2015

VIA ECF

Honorable Karen Williams
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, NJ 08608

Re: **REQUEST FOR A CONSENTED TO EXTENSION FOR PLAINTIFF TO
RESPOND TO “DEFENDANT’S MOTION TO DISMISS”, FOR WHICH A
RESPONSE IS OTHERWISE DUE ON MARCH 24, 2015**

Garfum Corporation v. Reflections by Ruth, Civil Action No. 1:14-cv-05919

Dear Judge Karen Williams:

On February 13, 2015, Reflections by Ruth filed a Motion to Dismiss Garfum Corporation’s complaint in (Civ. Action No. 1:14-CV-05919, Dkt. 18-1). Garfum Corporation filed a previous letter to extend the time by 14 days to respond to said motion whereby the Court set a motion date of April 6, 2015 and Plaintiff’s response date of March 24, 2015.

Counsel for Plaintiff, Garfum Corporation requests that the Court further extend the time for Plaintiff to respond to said motion by an additional 14 days and that new date for Plaintiff to respond to said motion be up to and including April 7, 2015 with a motion day of April 20, 2015.

Since counsel for Defendants have consented to the requested extension, it is respectfully requested that good cause has been shown and that Plaintiff’s Motion for Extension should be granted.

To the extent that this mutually agreed request for an extension is acceptable to the Court, Plaintiff humbly requests the Court to “SO ORDER” this letter.

Respectfully,

/s/Lawrence Hersh

Lawrence Hersh, Esq.

Counsel for Plaintiff Garfum Corporation

cc: All counsel of record via CM/ECF.

SO ORDERED that Plaintiff's opposition to the Defendant's motion to dismiss would not be due until April 7, 2015, and Defendant's Reply (if any) will not be due until April 14, 2015.

Hon. Karen Williams, U.S.M.J.